

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Samsideen D. Quadri AKA Sam D Quadri

Case No.: 17-28121

Chapter: 13

All Cases: Moving Creditor: CitiMortgage, Inc. Date Case Filed: September 20, 2017

Nature of Relief Sought ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing N/A or Date Plan Confirmed 01/24/2018

Chapter 7: ☐ No-Asset Report filed on _____
☐ No-Asset Report not filed. Date of Creditor's Meeting: _____

1. Collateral

- a. ☒ Home 3125 Alexander Crescent, Flossmoor, IL 60422-1707
- b. ☐ Car Year, Make, and Model _____
- c. ☐ Other (describe) _____

2. Balance Owed as of January 14, 2021: \$157,643.98

Total of all other Liens against Collateral: \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition:

4. Estimated Value of Collateral (must be supplied in all cases) \$215,690.00, the Debtor's Schedule A

5. Default

- a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
- b. ☒ Post-Petition Default
 - i. ☒ On direct payments to the moving creditor
Number of months 11 Amount \$16,167.46
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations

- a. ☒ Lack of Adequate Protection 11 U.S.C. §362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☐ Other _____
- b. ☒ No Equity and Not Necessary for an Effective Reorganization 11 U.S.C. §362(d)(2)
- c. ☐ Other "Cause" 11 U.S.C. §362(d)(1)
 - v. ☐ Bad Faith (describe) _____
 - vi. ☐ Multiple filings
 - vii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

viii. ☐ Reaffirm

ix. ☐ Redeem

x. ☐ Surrender

xi. ☒ No
Statement of
Intentions Filed

Date: 2/3/2021

Respectfully submitted,

/s/ Todd J. Ruchman

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Attorneys for Creditor

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